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JASON EDWARD THOMAS CARDIFF
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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
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14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS
18 CARDIFF,

19 Defendant.
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Case No. 5:23-cr-00021-JGB

**DECLARATION OF STEPHEN R.
COCHELL IN SUPPORT OF
JASON CARDIFF'S *EX PARTE*
APPLICATION FOR AN ORDER
PERMITTING INTERNATIONAL
TRAVEL AND RETURNING HIS
PASSPORT AND FOR VIDEO
CONFERENCE OF PRETRIAL
MOTION HEARINGS**

*[Filed concurrently with Ex Parte
Application and [Proposed] Order]*

DECLARATION OF STEPHEN R. COCHELL

I, Stephen R. Cochell, declare as follows:

1. I represent Jason Cardiff in this matter. I make this declaration in support of Jason Cardiff's Ex Parte Application for an Order Extending International Travel and Returning his Passport.

2. Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the amount of \$500,000 with full deeding of real property. His release conditions include: a travel restriction to the Central District of California and the Southern District of Texas; a curfew between the hours of 8:00 p.m. and 8:00 a.m.; and, placement in the custody of third-party custodian, Attorney Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties in support of the bond. Ms. Murphy also deeded her home as collateral.

3. Mr. Cardiff is living with Attorney Cochell in the Kingwood, Texas, and he is being supervised by United States Probation Officer Ryan McClellan of the Southern District of Texas Pretrial Services Office who recently replaced Jack Sherrod of that same office.

4. The Court previously granted permission to travel to Ireland to assist Mr. Cardiff's wife for her medical needs and to help care for his ten year old daughter. As set out in his request in that previous request, Mr. Cardiff had also scheduled necessary medical appointments for himself, including a consultation with his cardiologist. Unfortunately, Mr. Cardiff's cardiologist, Dr. H.B. has referred Mr. Cardiff for a full cardiology workup. Mr. Cardiff also had unanticipated health problems. Counsel received correspondence from Bellbridge Medical Centre dated December 12, 2024 referring to tests performed on Mr. Cardiff and finding him "medically unfit to fly until further notice" pending further testing. Counsel submitted records under seal in support of the motion.

5. The Court granted an extension of Mr. Cardiff's international travel for purposes of testing, evaluation and treatment. Dkt. 133.

6. Mr. Cardiff underwent testing recommended by his physicians. Counsel is in receipt of correspondence from Mr. Cardiff's General Practitioner, who notes that certain test results have not yet been received and that further testing is required. Mr. Cardiff's General Practitioner concludes that Mr. Cardiff is still "deemed unfit to fly" at this time. Medical records will be submitted under seal for the Court's in camera review.

7. I talked directly with Mr. McClellan on December 13, 2024. Mr. McClellan was unable to provide a position on whether Mr. Cardiff's request because he believes that he must confer with Pretrial Services in Los Angeles. Mr. McClellan did state that he was aware that Jack Sherrod, who he replaced, had previously taken position for Pretrial Services and had not opposed earlier travel requests and believed that Mr. Cardiff was cooperative with Pretrial Services.

7. On December 12, 2024, I contacted Valerie Makarewicz and Manu Sebastian, attorneys for the Government and sought their concurrence in this request. Ms. Makarewicz indicated that the Government opposed the motion.

8. Because Defendant cannot travel due to his health condition, the Court has re-set the hearings on Defendants Motion to Dismiss Count 2 of the Indictment and Defendants Motion to Dismiss Indictment Based on Double Jeopardy to January 13, 2025 at 2:00 p.m., Defendant requests that he be allowed to participate by video conference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 13th day of December, 2024, at Houston Texas.

/s/ Stephen R. Cochell
Stephen R. Cochell

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Dated: December 13, 2024